

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

NELSON WILLIS,

Plaintiff,

vs.

ADAM M. ARON,

Defendant.

Case No.: 4:23-CV-732-ALM-KPJ

**DEFENDANT ADAM M. ARON'S RESPONSE TO PLAINTIFF'S
SUPPLEMENTAL OBJECTIONS, DISCOVERY REQUEST, AND
MOTION FOR MENTAL EVALUATION**

Defendant Adam M. Aron (“Aron”) requests that the Court exercise its sound discretion and deny Plaintiff’s Supplemental Objection to the Report and Recommendation of the United States Magistrate Judge, Discovery Request, and Motion for Mental Evaluation filed on June 11, 2024 [Dkt. 44].

Aron refers the Court to his Response to Plaintiff’s Objection to Report and Recommendation and Motion to Remove Judge filed on June 20, 2024 [Dkt. 48], which is incorporated herein by reference.

Further, Plaintiff failed to meet his burden to show that a mental evaluation of Aron is appropriate in this case under FED. R. CIV. P. 35. Aron’s mental state is not in controversy.¹ Plaintiff’s mental evaluation request is more harassment directed at Aron. Plaintiff failed to meet his burden in showing good cause for this mental evaluation request.

¹ It is Aron who is seeking protection from Plaintiff due to Plaintiff’s behavior, which includes online harassment and cyberstalking. [See Dkt. 12].

CONCLUSION

For all these reasons, this Court should deny Plaintiff's Supplemental Objection to the Report and Recommendation of the United States Magistrate Judge, Discovery Request, and Motion for Mental Evaluation filed on June 11, 2024 [Dkt. 44].

Respectfully submitted,

By: /s/ Richard A. Illmer

Richard A. Illmer
State Bar No. 10388350
rick.illmer@huschblackwell.com
Meghann Reeves
State Bar No. 24094499
meghann.reeves@huschblackwell.com

HUSCH BLACKWELL LLP
1900 N. Pearl St., Suite 1800
Dallas, Texas 75201
(214) 999-6100
(214) 999-6170 *facsimile*

ATTORNEYS FOR DEFENDANT
ADAM M. ARON

CERTIFICATE OF SERVICE

The undersigned certifies that on June 25, 2024, a true and correct copy of the foregoing document will be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ Richard A. Illmer

Richard A. Illmer